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Attorneys for Defendant

6 State Farm Mutual Automobile Insurance Company

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 **CHARLES KEENAN, Individually;**  
11 **TAMMY KEENAN, individually;**

12 Plaintiff,

13 v.

14 **STATE FARM MUTUAL AUTOMOBILE**  
15 **INSURANCE COMPANY; DOES I-X,**  
16 **and ROE CORPORATIONS I-X,**  
17 **inclusive**

18 Defendant

2:17-cv-01999-RFB-VCF

\*SUBMITTED IN COMPLIANCE  
WITH LR 26-1(e) \*

19 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES**  
20 **(FIRST REQUEST)**

21 Pursuant to Local Rules 6-1 and 26-4, the parties, by and  
22 through their respective counsel of record, hereby stipulate to  
23 and request that the Court extend the deadlines by sixty days.

24 **A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED:**

1 The following discovery has been completed by the parties:

- 2 1. Defendant's Initial Disclosure, pursuant to FRCP  
3 26(f);
- 4 2. Plaintiff's Initial Disclosure, pursuant to FRCP  
5 26(f);
- 6 3. Defendant's First Supplemental Initial Disclosure,  
7 pursuant to FRCP 26(f);
- 8 4. Defendant's First Set of Request for Admissions to  
9 Plaintiff, Charles Keenan;
- 10 5. Defendant's First Set of Request for Admissions to  
11 Plaintiff, Tammy Keenan;
- 12 6. Plaintiff's Requests for Admissions to Defendant;
- 13 7. Plaintiff, Charles Keenan, Responses to Defendant's  
14 Requests for Admissions;
- 15 8. Plaintiff, Tammy Keenan, Responses to Defendant's  
16 Requests for Admissions;
- 17 9. Defendant's Responses to Plaintiff's Requests for  
18 Admissions;
- 19 10. Plaintiff's Interrogatories to Defendant;
- 20 11. Defendant's Interrogatories to Plaintiff, Charles  
21 Keenan;
- 22 12. Defendant's Interrogatories to Plaintiff, Tammy  
23 Keenan;
- 24

13. Plaintiff, Charles Keenan, Responses to Defendant's Interrogatories;
14. Plaintiff, Tammy Keenan, Responses to Defendant's Interrogatories;
15. Defendant's Responses to Plaintiff's Interrogatories;
16. Defendant's Request for Production of Documents to Plaintiff, Charles Keenan;
17. Defendant's Request for Production of Documents to Plaintiff, Tammy Keenan;
18. Plaintiff's Request for Production of Documents to Defendant;
19. Plaintiff, Charles Keenan, Responses to Defendant's Request for Production of Documents;
20. Plaintiff, Tammy Keenan, Responses to Defendant's Request for Production of Documents;
21. Defendant's Responses to Plaintiff's Request for Production of Documents;

**B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE COMPLETED:**

1. Depositions of the Person Most Knowledgeable from Plaintiff's medical providers relevant to treatment rendered to Plaintiff since the date of this accident;
2. Deposition of Plaintiff;
3. Deposition of Defendant's representatives;

4. Disclosures of Plaintiff and Defendant's experts;

5. Depositions of Plaintiff and Defendant's experts;

6. Independent Medical Examination of Plaintiff, Tammy Keenan;

**A. THE REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER:**

Both parties have been working diligently to move this matter forward. At this time both parties are requesting are requesting an additional sixty days to obtain experts. Both parties believe that the additional time will allow the parties to retain their experts during the holiday time, obtain the remaining depositions and perform an Independent Medical Examination of Plaintiff, Tammy Keenan. Further, the parties believe that this will better position the parties for a potential settlement conference and early resolution of this dispute.

**D. A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:**

	Old Deadline	New Deadline
Discovery Cut off:	02/19/18	04/20/2018
Amending Pleadings & Adding Parties:	11/21/17	CLOSED
Expert Disclosure:	12/21/17	02/19/2018
Rebuttal of Experts:	01/17/2018	03/21/2018
Interim Status Report:	12/21/2017	02/19/2018

Dispositive Motions: 03/20/2018 05/21/2018

**F. SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY DELAYIN  
DISCOVERY OR THE TRIAL OF THIS MATTER.**

Dated: December 5<sup>th</sup>, 2017 Dated: December 5<sup>th</sup>, 2017

**RANALLI ZANIEL FOWLER & MORAN, GLEN LERNER INJURY ATTORNEYS  
LLC**

/s/ Benjamin J. Carman  
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Charles Keenan and  
Tammy Keenan

**ORDER**

IT IS SO ORDERED:

Dated: 12-6-2017  
\_\_\_\_\_

  
UNITED STATES MAGISTRATE JUDGE

The Joint Pretrial Order is due June 21, 2018. If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.